

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

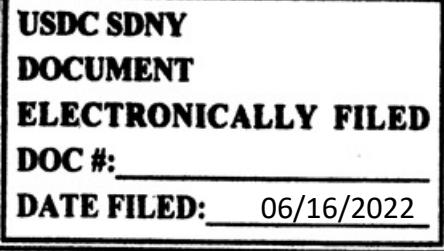
Allianz Global Investors GmbH, et al.,

Plaintiffs,

-against-

Bank of America Corporation, et al.,

Defendants.



Case No.: 1:18-cv-10364-LGS-SDA

[PROPOSED] ORDER GRANTING UNOPPOSED MOTION FOR ISSUANCE OF HAGUE CONVENTION REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE TO OBTAIN EVIDENCE IN THE NETHERLANDS

The Court, having reviewed Defendants' Unopposed Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas and the accompanying papers, HEREBY ORDERS THAT:

1. The Motion is GRANTED.
2. The Request for Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters attached as Exhibit A to the Declaration of Andrew D. Lazerow, is hereby issued as the Court's "Letter of Request" and is fully incorporated herein.
3. The signed Order and the Letter of Request will be given to Covington & Burling LLP, who will cause both documents to be filed with The District Court in The Hague (Rechtbank Den Haag), Team Administratie Civiel – Algemene Zaken, Postbus 20302, 2500 EH THE HAGUE, Netherlands.
4. The Stipulation and Second Amended Order of Confidentiality (ECF No. 767) in this action shall apply to the testimony of Mark Portlock, including any transcript or video.

5. Neither this Order, testimony of Mr. Portlock, nor the terms of the Letter of Request (which are incorporated into this Order) shall be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of the Kingdom of the Netherlands, the United States of America, or the State of New York.

IT IS SO ORDERED.

DATED: June 16, 2022



THE HONORABLE STEWART D. AARON
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Allianz Global Investors GmbH, et al.,

Plaintiffs,

-against-

Bank of America Corporation, et al.,

Defendant.

Case No.: 1:18-cv-10364-LGS-SDA

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT TO THE
HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF EVIDENCE
ABROAD IN CIVIL OR COMMERCIAL MATTERS**

The United States District Court for the Southern District of New York (“Southern District”) presents its compliments to the appropriate judicial authority of the Kingdom of the Netherlands for assistance in obtaining evidence to be used at trial in the above-captioned civil proceeding before this Court (the “Proceeding”). This request is made pursuant to and in conformity with the Hague Convention of 18 March 1970 on the Taking of Evidence in Civil or Commercial Matters (“Hague Convention”). The Southern District is a court of law and equity and has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. §§ 15(a) and 26.

The Southern District has determined that it would further the interests of justice to obtain the testimony, under oath, of Mark Portlock residing within your jurisdiction. The Proceeding involves claims of a conspiracy to violate the antitrust laws of the United States, as well as alleged breaches of the tort of unjust enrichment. The Defendants claim that, from July 2006 to August 2010, Mr. Portlock was an employee of Portigon AG (“Portigon”) and its affiliates and/or former entities (including WestLB AG, hereafter “WestLB”). During that time, Mr. Portlock held various management positions at WestLB relating to FX trading. Plaintiff Portigon is a plaintiff in the

Proceeding. The Defendants assert that Mr. Portlock has knowledge relevant to this Proceeding as described in more detail below.

The Defendants assert that the testimony of Mr. Portlock is not available from any source within the jurisdiction of the Southern District, and cannot be obtained by any means other than pursuant to an order of appropriate judicial authority of the Kingdom of the Netherlands compelling the witness to appear for examination. The Defendants aver that Mr. Portlock, a non-party to this action, is currently based in Amsterdam, with an address of [REDACTED]
[REDACTED]

The Defendants believe that this request: (1) will not require Mr. Portlock to commit any offense; (2) will not require Mr. Portlock to undergo a broader inquiry than he would have if the litigation were conducted in the Kingdom of the Netherlands; and (3) will not violate the laws of civil procedure of any Dutch court.

The Southern District, therefore, and in conformity with Article 3 of the Hague Convention, respectfully requests that you, in furtherance of justice by proper process, (1) cause Mr. Portlock to appear before an official authorized to administer oaths and to provide testimony and answer questions and cross-questions on his oath or affirmation, and (2) direct his testimony to be transcribed and recorded by video, and the transcript and video be sent to counsel for the parties in the Proceeding, who so request a copy. The Southern District stands ready to provide similar judicial assistance to judicial authorities in the Kingdom of the Netherlands when required.

Finally, this Court requests from the judicial authority of the Kingdom of the Netherlands that this Letter of Request and its exhibits be closed to public inspection to the maximum extent permitted by your laws because they are subject to a Protective Order in this case and have been

filed under seal with this Court. *See* Stipulation and Order of Confidentiality (“Protective Order”) dated February 24, 2021, attached hereto as Exhibit 1.

The particulars of this Hague Evidence Request are as follows:

1. Sender

The Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007
United States of America

2. Central Authority of the Requested State

The District Court in The Hague (Rechtbank Den Haag)
Team Administratie Civiel – Algemene Zaken
Postbus 20302
2500 EH THE HAGUE
Netherlands

3. Person to whom the executed request is to be returned

The Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007
United States of America

and

Andrew A. Ruffino
Covington & Burling LLP
620 Eighth Avenue
New York, New York 10018
Telephone: (212) 841-1000
aruffino@cov.com

Andrew D. Lazerow
Covington & Burling LLP
850 Tenth Street, NW

Washington, DC 20001
Telephone: (202) 662-6000
alazerow@cov.com

4. Specification of the date by which the requesting authority requires receipt of the response to the Request for International Judicial Assistance ("Request for Assistance")

The requesting authority would greatly appreciate a response to the Request for Assistance within 21 days or as soon thereafter as is practicable.

IN CONFORMITY WITH ARTICLE 3 OF THE HAGUE CONVENTION, THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK THEREFORE HAS THE HONOR TO SUBMIT THE FOLLOWING REQUEST:

5a. Requesting Judicial Authority

United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007
United States of America

5b. To the competent authority of

Kingdom of the Netherlands

5c. Name of the case and any identifying number

Allianz Global Investors GmbH, et al., v. Bank of America Corporation, et al., Case No. 1:18-cv-10364-LGS (S.D.N.Y.)

6. Names and addresses of the parties and their representatives

a. Plaintiffs

Allianz Global Investors GmbH; Allianz Global Investors Fund Société d'Investissement à Capital Variable (f/k/a Dresdner Global Strategies Fund Société d'Investissement à Capital Variable); ; Allianz Global Investors Taiwan Limited; Allianz Global Investors U.S. LLC; AllianzGI NFJ All-Cap Fund, a series of Allianz Funds; Allianz AGIC Global Fund, a series of Allianz Funds; Allianz AGIC International Growth Fund, a series of Allianz Funds Multi-Strategy Trust; AllianzGI AGIC Small to Mid Cap Growth Fund, a series of Allianz Funds Multi-Strategy Trust; Allianz OCC Equity Premium Strategy Fund, a series of Allianz Funds; Allianz AGIC International Fund, a series of Allianz Funds; Allianz AGIC International Growth Fund, a series of Allianz Funds Multi-Strategy Trust; "Allianz AGIC International Growth Opportunities Fund, n/k/a AllianzGI International Small-Cap Fund, a series of Allianz Funds Multi-Strategy Trust"; Allianz AGIC

Pacific Rim Fund, n/k/a AllianzGI Emerging Markets Opportunities Fund, a series of Allianz Funds; Allianz AGIC Target Fund, n/k/a AllianzGI Mid-Cap Fund, a series of Allianz Funds; Allianz Global Investors Capital International Systematic Fund LLC; Allianz OCC International Equity Fund, a series of Allianz Funds; Allianz OCC Renaissance Fund, a series of Allianz Funds; Allianz OCC Value Fund, a series of Allianz Funds; Allianz RCM All Alpha Fund, a series of Allianz Funds Multi- Strategy Trust; Allianz RCM All Horizons Fund, a series of Allianz Funds Multi-Strategy Trust; Allianz RCM Biotechnology Fund add Global Health Sciences, n/k/a AllianzGI Health Sciences Fund, a series of Allianz Funds; Allianz RCM BRIC Stars Fund, n/k/a Allianz Emerging Markets Equity Fund; Allianz RCM Disciplined International Equity Fund, a series of Allianz Funds; Allianz RCM Disciplined International Equity Fund - Fgn.Equity; Allianz RCM Disciplined International Equity Fund - Fgn.Equity; Allianz RCM Global Small Cap Fund, n/k/a AllianzGI Global-Small Cap Fund, a series of Allianz Funds; ALLIANZ RCM GLOBAL SUSTAINABILITY FUND, n/k/a AllianzGI Global Sustainability Fund, a series of Allianz Funds Multi-Strategy Trust; Allianz RCM International Opportunities Fund, a series of Allianz Funds Multi-Strategy Trust; Allianz RCM Large-Cap Growth Fund, n/k/a AllianzGI Focused Growth Fund, a series of Allianz Funds; Allianz RCM Mid-Cap Fund, n/k/a AllianzGI Mid-Cap Fund, a series of Allianz Funds; AllianzGI Emerging Markets Consumer Fund, n/k/a AllianzGI Emerging Market Consumer Fund, a series of Allianz Funds Multi-Strategy Trust; AllianzGI Emerging Markets Opportunities Fund, a series of Allianz Funds; AllianzGI Emerging-Markets Small Cap, a series of Allianz Funds Multi-Strategy Trust; AllianzGI Global Equity & Convertible Income Fund, n/k/a AllianzGI Equity & Convertible Income Fund; AllianzGI Global Managed Volatility Fund, a series of Allianz Funds Multi-Strategy Trust; AllianzGI Global Natural Resources Fund, a series of Allianz Funds; AllianzGI Global Small-Cap Opportunities Portfolio, a portfolio of AllianzGI Institutional Multi-Series Trust; AllianzGI Global Small-Cap Fund, a series of Allianz Funds; AllianzGI Health Sciences Fund, a series of Allianz Funds; AllianzGI Income & Growth Equity Fund, a series of Allianz Funds; AllianzGI International & Premium Strategy Fund; AllianzGI International Managed Volatility Fund , a series of Allianz Funds; AllianzGI Mid-Cap Fund, a series of Allianz Funds; NFJ Dividend, Interest & Premium Strategy Fund; AllianzGI NFJ Emerging Market Value Fund, a series of Allianz Funds Multi-Strategy Trust; AllianzGI NFJ International Small-Cap Value Fund; AllianzGI NFJ International Value Fund, a series of Allianz Funds; AllianzGI NFJ Mid-Cap Value Fund, a series of Allianz Funds; Nicholas-Applegate Emerging Markets Fund, n/k/a AllianzGI Emerging Markets Opportunities Fund, a series of Allianz Funds; Nicholas-Applegate Global Select Fund, a series of Allianz Funds; Nicholas-Applegate International Growth Fund, n/k/a AllianzGI International Growth Fund, a series of Allianz Funds Multi-Strategy Trust; Nicholas-Applegate Small Cap Emerging Countries Series LLC; AllianzGI NFJ Small-Cap Value Fund, a series of Allianz Funds; Allianz RCM Disciplined International Equity Fund, a series of Allianz Funds; RCM Global Equity Fund, a series of Allianz Funds; RCM International Small Cap Fund, n/k/a AllianzGI International Small-Cap Fund, a series of Allianz Funds Multi- Strategy Trust; RCM Strategic Growth Fund, n/k/a AllianzGI Focused Growth Fund, a series of Allianz Funds; The Korea Fund, Inc.; Anchorage Capital Group, L.L.C.; Anchorage Capital Master Offshore LTD; Anchorage Capital Partners, L.P.; Anchorage Crossover Credit Finance, LTD; Anchorage Crossover Credit Offshore Master Fund, LTD; Anchorage Illiquid Opportunities Offshore Master II, L.P.; Anchorage Illiquid Opportunities Offshore Master III, L.P.; Anchorage Illiquid Opportunities Offshore Master, L.P.; Anchorage MSW Structured Credit Master, L.P.; Anchorage Short Credit Offshore Master Fund, Ltd.; GRF Master Fund, L.P; PCI Fund LLC; Anchorage Short Credit Offshore Master Fund II, L.P.; GRF Master Fund II, L.P.;

BlueCrest Capital Management Limited; BlueCrest Capital International Master Fund Limited; BlueCrest Capital International Limited; BlueCrest Strategic Limited; BlueCrest Emerging Markets Fund Limited; BlueCrest Emerging Markets Master Fund Limited; BlueCrest Volatility Arbitrage Master Fund Limited; BlueCrest Multi Strategy Credit Master Fund Limited; BSMA Limited; Brevan Howard Emerging Markets Strategies Master Fund Limited; Brevan Howard Equity Strategies Master Fund Limited; Brevan Howard Master Fund Limited; Brevan Howard Multi-Strategy Master Fund Limited; Brevan Howard Strategic Macro Master Fund Limited; Brevan Howard Strategic Opportunities Fund Limited; Brevan Howard Asia Master Fund Limited; WCG Strategies Fund Limited; Pacific Investment Management Company LLC; Fixed Income Shares (Series R); Fixed Income Shares: Series C; Fixed Income Shares: Series M; LVS I LLC; LVS II LLC; LVS II Offshore, L.P.; LVS Offshore I, L.P.; PIMCO Absolute Return Strategy 3 Master Fund LDC; PIMCO Absolute Return Strategy 3 Master Fund LDC with respect to its Class relating to the GBP Class of PIMCO Absolute Return Strategy 3 Offshore Fund Ltd.; PIMCO Absolute Return Strategy 3D Offshore Fund Ltd.; PIMCO Absolute Return Strategy 3E Master Fund LDC with respect to its Class relating to the AUD Class of the PIMCO Absolute Return Strategies 3E Offshore Fund Ltd.; PIMCO Absolute Return Strategy 3E Master Fund LDC with respect to its Class relating to the EURO Institutional Class of the PIMCO Absolute Return Strategies 3E Offshore Fund Ltd.; PIMCO Absolute Return Strategy 3E Master Fund LDC with respect to its Class relating to the Swedish Krona Institutional Class of the PIMCO Absolute Return Strategy 3E Offshore Fund Ltd.; PIMCO Absolute Return Strategy IV IDF LLC; PIMCO Absolute Return Strategy IV Master Fund LDC; PIMCO Absolute Return Strategy IV Master Fund LDC with respect to its Class relating to the Australian Dollar Institutional Class of the PIMCO Absolute Return Strategies IV Offshore Fund I Ltd.; PIMCO Absolute Return Strategy IV Master Fund LDC with respect to its Class relating to the Canadian Dollar Institutional Class of the PIMCO Absolute Return Strategy IV Offshore Fund 1 Ltd.; PIMCO Absolute Return Strategy IV Master Fund LDC with respect to its Class relating to the Euro Institutional Class of the PIMCO Absolute Return Strategies IV Offshore Fund I Ltd.; PIMCO Absolute Return Strategy IV Master Fund LDC with respect to its Class relating to the Sterling Institutional Class of the PIMCO Absolute Return Strategies IV Offshore Fund I Ltd.; PIMCO Absolute Return Strategy IV Master Fund LDC with respect to its Class relating to the Yen Institutional Class of the PIMCO Absolute Return Strategies IV Offshore Fund I Ltd.; PIMCO Absolute Return Strategy V Master Fund LDC; PIMCO Absolute Return Strategy V Master Fund LDC with respect to its Class relating to the Euro Institutional Class of the PIMCO Absolute Return Strategies V Offshore Fund Ltd.; PIMCO Australia Management Limited as responsible entity for PIMCO Australian Bond Fund; PIMCO Australia Management Limited as responsible entity for PIMCO Australian Short-Term Bond Fund; PIMCO Australia Management Limited as responsible entity for PIMCO Diversified Fixed Interest Fund; PIMCO Australia Management Limited as responsible entity for PIMCO Global Bond Fund; PIMCO Australia Management Limited as responsible entity for PIMCO Global Credit Fund; PIMCO Australia Management Limited as responsible entity for PIMCO Target Return Fund; PIMCO Bermuda Trust II: PIMCO Bermuda Bank Loan Fund A; PIMCO Bermuda Trust II: PIMCO Bermuda Bank Loan Fund B; PIMCO Bermuda Trust II: PIMCO Bermuda Emerging Markets Bond Fund (M); PIMCO Bermuda Trust II: PIMCO Bermuda Emerging Markets Bond Fund II; PIMCO Bermuda Trust II: PIMCO Bermuda Global

Aggregate Ex- Japan (Yen-Hedged) Bond Fund; PIMCO Bermuda Trust II: PIMCO Bermuda Global Aggregate Ex- Japan Bond Fund (M); PIMCO Bermuda Trust II: PIMCO Bermuda U.S. High Yield Fund; PIMCO Bermuda Trust II: PIMCO Bermuda U.S. High Yield Fund (M); PIMCO Bermuda Trust II: PIMCO Bermuda U.S. High Yield Fund II (M); PIMCO Bermuda Trust II: PIMCO Emerging Bond (Yen-Hedged) Income Fund; PIMCO Bermuda Trust II: PIMCO Emerging Bond Income Fund; PIMCO Bermuda Trust II: PIMCO Emerging Bond Income Fund (M); PIMCO Bermuda Trust II: PIMCO Emerging Bond Income Fund II; PIMCO Bermuda Trust II: PIMCO Emerging Bond Income Fund III; PIMCO Bermuda Trust II: PIMCO U.S. High Yield (Yen-Hedged) Fund; PIMCO Bermuda Trust II: PIMCO U.S. High Yield (Yen-Hedged) Fund II; PIMCO Bermuda Trust II: PIMCO U.S. High Yield Strategy Fund; PIMCO Bermuda Trust II: PIMCO U.S. High Yield Strategy Fund II; PIMCO Bermuda Trust II: PIMCO World High Income; PIMCO Bermuda Trust IV: PIMCO Bermuda Brazil Corporate Bond Fund; PIMCO Bermuda Trust IV: PIMCO Bermuda Brazil Corporate Bond Fund (M); PIMCO Bermuda Trust IV: PIMCO Bermuda Brazil Government Bond Fund; PIMCO Bermuda Trust IV: PIMCO Bermuda Brazil Government Bond Fund (M); PIMCO Bermuda Trust IV: PIMCO Bermuda Emerging Currency High Income Fund; PIMCO Bermuda Trust IV: PIMCO Bermuda Emerging Market High Yield Corporate Bond Fund (M); PIMCO Bermuda Trust IV: PIMCO Bermuda Emerging Market High Yield Corporate Bond Fund A; PIMCO Bermuda Trust IV: PIMCO Bermuda Emerging Market High Yield Corporate Bond Fund B; PIMCO Bermuda Trust IV: PIMCO Bermuda Emerging Markets and Infrastructure Bond Fund (M); PIMCO Bermuda Trust IV: PIMCO Bermuda Emerging Markets and Infrastructure Bond Fund A; PIMCO Bermuda Trust IV: PIMCO Bermuda Emerging Markets and Infrastructure Bond Fund B; PIMCO Bermuda Trust IV: PIMCO Bermuda Global Bond Ex-Japan Fund; PIMCO Bermuda Trust IV: PIMCO Emerging Bond Strategy Fund; PIMCO Bermuda Trust IV: PIMCO Global Bond Strategy Fund; PIMCO Bermuda Trust IV: PIMCO Global High Yield Strategy Fund; PIMCO Bermuda Trust IV: PIMCO U.S. High Yield Strategy Fund A; PIMCO Bermuda Trust IV: PIMCO U.S. High Yield Strategy Fund B; PIMCO Bermuda Trust: PIMCO Bermuda Foreign Low Duration Fund; PIMCO Bermuda Trust: PIMCO Bermuda U.S. Low Duration Fund; PIMCO Bermuda Trust: PIMCO Emerging Markets Bond Fund (JITF); PIMCO Bermuda Trust: PIMCO Emerging Markets Bond Fund (M); PIMCO Bermuda Trust: PIMCO Emerging Markets Bond Fund (Yen-Hedged); PIMCO Bermuda Trust: PIMCO Emerging Markets Bond Fund II; PIMCO Bermuda Trust: PIMCO Euro Total Return Fund; PIMCO Bermuda Trust: PIMCO Real Return Fund; PIMCO BRAVO Fund II, L.P.; PIMCO BRAVO Fund, L.P.; PIMCO Canada Canadian CorePLUS Bond Trust; PIMCO Canada Canadian CorePLUS Long Bond Trust; PIMCO Canadian Total Return Bond Fund; PIMCO Cayman Commodity Fund I Ltd.; PIMCO Cayman Commodity Fund III, Ltd.; PIMCO Cayman Commodity Fund VII, Ltd.; PIMCO Cayman Commodity Portfolio I Ltd.; PIMCO Cayman SPC Limited; PIMCO Cayman Japan Core Segregated Portfolio; PIMCO Cayman SPC Limited; PIMCO Cayman Japan CorePLUS Segregated Portfolio; PIMCO Cayman SPC Limited; PIMCO Cayman Japan CorePLUS Strategy Segregated Portfolio; PIMCO Cayman Trust: PIMCO Cayman Australian Corporate Fund; PIMCO Cayman Trust: PIMCO Cayman Australian Multi-Sector Fund; PIMCO Cayman Trust: PIMCO Cayman Emerging Bond Fund (M); PIMCO Cayman Trust: PIMCO Cayman Emerging Bond Fund A; PIMCO Cayman Trust: PIMCO Cayman Emerging Bond Fund B; PIMCO Cayman Trust: PIMCO Cayman Emerging Local Bond Strategy Fund; PIMCO Cayman Trust: PIMCO Cayman European High Yield Fund; PIMCO Cayman Trust: PIMCO Cayman Foreign Bond Fund; PIMCO Cayman Trust: PIMCO Cayman Global Aggregate Bond Fund; PIMCO Cayman Trust: PIMCO Cayman Global Aggregate Ex- Japan (Yen-Hedged)

Bond Fund II; PIMCO Cayman Trust: PIMCO Cayman Global Aggregate Ex- Japan Bond Fund; PIMCO Cayman Trust: PIMCO Cayman Global Aggregate Ex- Japan Income Fund, which is included herein as a plaintiff both on its own behalf, and as successor to PIMCO Cayman Trust: PIMCO Cayman Global Aggregate Ex- Japan (Yen-Hedged) Income Fund; PIMCO Cayman Trust: PIMCO Cayman Global Credit Alpha Fund; PIMCO Cayman Trust: PIMCO Cayman Global Ex-Japan (Yen- Hedged) Bond Fund; PIMCO Cayman Trust: PIMCO Cayman Global High Income Fund, which is included herein as a plaintiff both on its own behalf, and as successor to PIMCO Cayman Trust: PIMCO Cayman Global High Income (Yen-Hedged) Fund; PIMCO Cayman Trust: PIMCO Cayman Japan CorePLUS Fund II; PIMCO Cayman Trust: PIMCO Cayman U.S. Bond Fund; PIMCO Cayman Trust: PIMCO Cayman U.S. Investment Grade Corporate Bond Fund; PIMCO Cayman Trust: PIMCO Cayman U.S. Investment Grade Intermediate Corporate Bond (Yen- Hedged) Fund; PIMCO Combined Alpha Strategies Master Fund LDC; PIMCO Combined Alpha Strategies Master Fund LDC with respect to its Class relating to US Government/Credit Overlay Share Class of PIMCO Combined Alpha Strategies Offshore Fund Ltd.; PIMCO Commodity Alpha Master Fund Ltd.; PIMCO Corporate & Income Opportunity Fund; PIMCO Corporate & Income Strategy Fund; PIMCO Distressed Credit Fund B, L.P.; PIMCO Distressed Credit Fund, L.P., which is included herein as a plaintiff both on its own behalf, and as successor to PIMCO Distressed Credit Fund Offshore Investments, L.P.; PIMCO Distressed Senior Credit Opportunities Fund II, L.P.; PIMCO Dynamic Credit and Mortgage Income Fund; PIMCO Dynamic Income Fund; PIMCO Equity Series VIT: PIMCO StocksPLUS® Global Portfolio; PIMCO Equity Series: PIMCO Dividend and Income Fund (f/k/a PIMCO Equity Series: PIMCO Dividend and Income Builder Fund); PIMCO ETF Trust: PIMCO Active Bond Exchange-Traded Fund; PIMCO Fixed Income Source ETFs plc, PIMCO Emerging Markets Advantage Local Bond Index Source UCITS ETF; PIMCO Fixed Income Source ETFs plc, PIMCO Euro Short Maturity Source UCITS ETF; PIMCO Fixed Income Source ETFs plc, PIMCO Short-Term High Yield Corporate Bond Index Source UCITS ETF; PIMCO Fixed Income Source ETFs plc, PIMCO Sterling Short Maturity Source UCITS ETF; PIMCO Flexible Global Bond Fund (Canada); PIMCO Funds Ireland plc, PIMCO Capital Securities Fund; PIMCO Funds: Global Investors Series plc Euro Bond Fund; PIMCO Funds: Global Investors Series plc Global Investment Grade Credit Fund; PIMCO Funds: Global Investors Series plc, Commodity Real Return Fund; PIMCO Funds: Global Investors Series plc, Diversified Income Duration Hedged Fund; PIMCO Funds: Global Investors Series plc, Diversified Income Fund; PIMCO Funds: Global Investors Series plc, Emerging Asia Bond Fund; PIMCO Funds: Global Investors Series plc, Emerging Local Bond Fund; PIMCO Funds: Global Investors Series plc, Emerging Markets Bond Fund; PIMCO Funds: Global Investors Series plc, Emerging Markets Corporate Bond Fund; PIMCO Funds: Global Investors Series plc, Emerging Markets Short-Term Local Currency Fund; PIMCO Funds: Global Investors Series plc, Euro Bond Fund; PIMCO Funds: Global Investors Series plc, Euro Credit Fund; PIMCO Funds: Global Investors Series plc, Euro Income Bond Fund; PIMCO Funds: Global Investors Series plc, Euro Long Average Duration Fund; PIMCO Funds: Global Investors Series plc, Euro Low Duration Fund; PIMCO Funds: Global Investors Series plc, Euro Short-Term Fund; PIMCO Funds: Global Investors Series plc, Global Advantage Fund; PIMCO Funds: Global Investors Series plc, Global Advantage Real Return Fund; PIMCO Funds: Global Investors Series plc, Global Bond Ex-US Fund; PIMCO Funds: Global Investors Series plc, Global Bond Fund; PIMCO Funds: Global Investors Series plc, Global High Yield Bond Fund; PIMCO Funds: Global Investors Series plc, Global Investment Grade Credit Fund; PIMCO Funds: Global Investors Series plc, Global Multi-Asset Fund; PIMCO

Funds: Global Investors Series plc, Global Real Return Fund; PIMCO Funds: Global Investors Series plc, Income Fund; PIMCO Funds: Global Investors Series plc, Inflation Strategy Fund; PIMCO Funds: Global Investors Series plc, Low Average Duration Fund; PIMCO Funds: Global Investors Series plc, PIMCO Capital Securities Fund; PIMCO Funds: Global Investors Series plc, PIMCO Credit Opportunities Bond Fund (f/k/a PIMCO Funds: Global Investors Series plc, PIMCO Credit Absolute Return Fund); PIMCO Funds: Global Investors Series plc, Socially Responsible Emerging Markets Bond Fund; PIMCO Funds: Global Investors Series plc, StocksPLUS™ Fund, which is included herein as a plaintiff both on its own behalf, and as successor to PIMCO Funds: Global Investors Series plc StocksPLUS Fund (GBP Hedged Share class); PIMCO Funds: Global Investors Series plc, Strategic Income Fund; PIMCO Funds: Global Investors Series plc, Total Return Bond Fund; PIMCO Funds: Global Investors Series plc, UK Corporate Bond Fund; PIMCO Funds: Global Investors Series plc, UK Long Term Corporate Bond Fund; PIMCO Funds: Global Investors Series plc, Dynamic Bond Fund (f/k/a PIMCO Funds: Global Investors Series plc, Unconstrained Bond Fund); PIMCO Funds: Global Investors Series plc, US High Yield Bond Fund; PIMCO Funds: PIMCO CommoditiesPLUS® Strategy Fund; PIMCO Funds: PIMCO CommodityRealReturn Strategy Fund®; PIMCO Funds: PIMCO Credit Opportunities Bond Fund; PIMCO Funds: PIMCO Diversified Income Fund; PIMCO Funds: PIMCO Dynamic Bond Fund; PIMCO Funds: PIMCO Emerging Local Bond Fund; PIMCO Funds: PIMCO Emerging Markets Bond Fund; PIMCO Funds: PIMCO Emerging Markets Corporate Bond Fund; PIMCO Funds: PIMCO Emerging Markets Currency and Short-Term Investments Fund; PIMCO Funds: PIMCO Extended Duration Fund; PIMCO Funds: PIMCO Global Advantage® Strategy Bond Fund; PIMCO Funds: PIMCO Global Bond Opportunities Fund (U.S. Dollar-Hedged); PIMCO Funds: PIMCO Global Bond Opportunities Fund (Unhedged); PIMCO Funds: PIMCO Global Multi-Asset Fund; PIMCO Funds: PIMCO High Yield Fund; PIMCO Funds: PIMCO High Yield Spectrum Fund; PIMCO Funds: PIMCO Income Fund; PIMCO Funds: PIMCO Inflation Response Multi-Asset Fund; PIMCO Funds: PIMCO International Bond Fund (U.S. Dollar-Hedged); PIMCO Funds: PIMCO International Bond Fund (Unhedged); PIMCO Funds: PIMCO Investment Grade Credit Bond Fund; PIMCO Funds: PIMCO Long Duration Total Return Fund; PIMCO Funds: PIMCO Long-Term Credit Bond Fund; PIMCO Funds: PIMCO Long-Term Real Return Fund; PIMCO Funds: PIMCO Low Duration ESG Fund; PIMCO Funds: PIMCO Low Duration Fund; PIMCO Funds: PIMCO Low Duration Income Fund; PIMCO Funds: PIMCO Moderate Duration Fund; PIMCO Funds: PIMCO Mortgage Opportunities and Bond Fund (f/k/a PIMCO Funds: PIMCO Mortgage Opportunities Fund); PIMCO Funds: PIMCO RAE Fundamental Advantage PLUS Fund; PIMCO Funds: PIMCO RAE PLUS EMG Fund; PIMCO Funds: PIMCO RAE PLUS Fund; PIMCO Funds: PIMCO RAE PLUS International Fund; PIMCO Funds: PIMCO RAE PLUS Small Fund; PIMCO Funds: PIMCO Real Return Fund; PIMCO Funds: PIMCO RealEstateRealReturn Strategy Fund; PIMCO Funds: PIMCO Senior Floating Rate Fund; PIMCO Funds: PIMCO Short- Term Fund; PIMCO Funds: PIMCO StocksPLUS® Absolute Return Fund; PIMCO Funds: PIMCO StocksPLUS® Fund; PIMCO Funds: PIMCO StocksPLUS® International Fund (U.S. Dollar-Hedged); PIMCO Funds: PIMCO StocksPLUS® International Fund (Unhedged); PIMCO Funds: PIMCO StocksPLUS® Long Duration Fund; PIMCO Funds: PIMCO StocksPLUS® Short Fund; PIMCO Funds: PIMCO StocksPLUS® Small Fund; PIMCO Funds: PIMCO Strategic Bond Fund; PIMCO Funds: PIMCO Total Return ESG Fund; PIMCO Funds: PIMCO Total Return Fund; PIMCO Funds: PIMCO Total Return Fund IV; PIMCO Funds: Private Account Portfolio Series International Portfolio; PIMCO Funds: Private Account Portfolio Series PIMCO EM Bond and

Short-Term Investments Portfolio; PIMCO Funds: Private Account Portfolio Series PIMCO High Yield and Short-Term Investments Portfolio; PIMCO Funds: Private Account Portfolio Series PIMCO Investment Grade Credit Bond Portfolio; PIMCO Funds: Private Account Portfolio Series PIMCO Long Duration Credit Bond Portfolio; PIMCO Funds: Private Account Portfolio Series Real Return Portfolio; PIMCO Funds: Private Account Portfolio Series Short Term Floating NAV Portfolio II; PIMCO Global Credit Opportunity Master Fund LDC; PIMCO Global StocksPLUS & Income Fund; PIMCO High Income Fund; PIMCO Income Opportunity Fund; PIMCO Income Strategy Fund; PIMCO Income Strategy Fund II; PIMCO Large Cap StocksPLUS Absolute Return Fund; PIMCO Luxembourg Trust IV - PIMCO Total Return Fund Multi- Currency Selection; PIMCO Luxembourg Trust IV, PIMCO Total Return Fund; PIMCO Luxembourg Trust IV, PIMCO Total Return Fund II; PIMCO Luxembourg Trust IV, PIMCO Total Return Fund Multi-Currency Selection; PIMCO Luxembourg Trust IV, PIMCO Total Return Strategy Fund; PIMCO Luxembourg Trust, CommoditiesPLUS Strategy Fund; PIMCO Luxembourg Trust, Global Investment Grade Credit Fund; PIMCO Luxembourg Trust, Global Real Return Fund in Swiss Francs; PIMCO Monthly Income Fund (Canada); PIMCO Multi-Asset Volatility Master Fund Ltd.; PIMCO Multi-Asset Volatility Offshore Fund II Ltd.; PIMCO Multi-Sector Strategy Fund Ltd.; PIMCO Offshore Funds - PIMCO Absolute Return Strategy IV eFund; PIMCO Offshore Funds: PIMCO Cayman UK Long Duration Fund; PIMCO Offshore Funds: PIMCO Offshore Funds Overlay Strategies Fund VII; PIMCO Offshore Funds: PIMCO Offshore Funds Overlay Strategies Fund X; PIMCO Offshore Funds: PIMCO Offshore Funds Overlay Strategies Fund XI; PIMCO Offshore Funds: PIMCO U.S. Investment Grade Corporate Bond Fund; PIMCO Select Funds plc, UK Income Bond Fund; PIMCO Select Funds plc, Dynamic Bond Fund (f/k/a PIMCO Select Funds plc, Unconstrained Bond Fund); PIMCO Strategic Income Fund, Inc.; PIMCO Tactical Opportunities Master Fund Ltd.; PIMCO Variable Insurance Trust: PIMCO Balanced Allocation Portfolio; PIMCO Variable Insurance Trust: PIMCO CommodityRealReturn Strategy Portfolio; PIMCO Variable Insurance Trust: PIMCO Dynamic Bond Portfolio; PIMCO Variable Insurance Trust: PIMCO Emerging Markets Bond Portfolio; PIMCO Variable Insurance Trust: PIMCO Global Bond Opportunities Portfolio (Unhedged); PIMCO Variable Insurance Trust: PIMCO Global Core Bond (Hedged) Portfolio; PIMCO Variable Insurance Trust: PIMCO Global Multi-Asset Managed Allocation Portfolio; PIMCO Variable Insurance Trust: PIMCO High Yield Portfolio; PIMCO Variable Insurance Trust: PIMCO International Bond Portfolio (U.S. Dollar-Hedged); PIMCO Variable Insurance Trust: PIMCO International Bond Portfolio (Unhedged); PIMCO Variable Insurance Trust: PIMCO Low Duration Portfolio; PIMCO Variable Insurance Trust: PIMCO Real Return Portfolio; PIMCO Variable Insurance Trust: PIMCO Short-Term Portfolio; PIMCO Variable Insurance Trust: PIMCO Total Return Portfolio; PIMCO Funds: Private Account Portfolio Series Short-Term Floating NAV Portfolio III, which is included herein as a plaintiff both on its own behalf, and as successor to PIMCO Cayman Japan Fund I Ltd.; StocksPLUS Sub-Fund B, LLC; SEI Trust Company; CIT – PIMCO Core Plus Bond Fund; CIT – PIMCO Global Advantage Strategy Collective Trust; CIT – PIMCO Real Return Collective Trust II; CIT – PIMCO Real Return Strategy Fund; CIT – PIMCO RealEstatePLUS Collective Trust; CIT – PIMCO Total Return Collective Trust; CIT – PIMCO Unconstrained Bond Collective Trust; CIT – PIMCO CommoditiesPLUS Collective Trust; AllianzGI Emerging Markets Consumer CIT; Allianz NFJ International Value CIT; Andra AP-fonden; California State Teachers' Retirement System; PFA Pension, Forsikringsaktieselskab; PFA Kapitalforening; Portigon AG; Pension Reserves Investment Management Board of Massachusetts; Active International Equity Fund - Jacket; Active International Equity Fund B - Jacket; Alpha Advantage 1000 Fund B - Aggregate;

Alpha Advantage 3000 Fund - Aggregate; Alpha Advantage 3000 Fund B - Aggregate; Alpha Advantage 500 Fund - Aggregate; Alpha Advantage 500 Fund B - Aggregate; Alpha Advantage International Fund - Aggregate; Alpha Advantage Japan Fund; Alpha Advantage Japan Fund B; Alpha Advantage US Fund B - Aggregate; BlackRock Inc.; BlackRock Life Limited on behalf of Ascent Life Sovereign Screened Fund; BlackRock Collective Investment Funds on behalf of the unitholders in BlackRock Balanced Managed Fund; BlackRock Global Funds - Asean Leaders Fund; BlackRock Global Funds - Asia Pacific Equity Income Fund; BlackRock Global Funds - Asian Dragon Fund; BlackRock Global Funds - Asian Growth Leaders Fund; BlackRock Global Funds - Asian Local Bond Fund; BlackRock Global Funds - Asian Tiger Bond Fund; BlackRock Global Funds - China Bond Fund; BlackRock Global Funds - China Fund; BlackRock Global Funds - Continental European Flexible Fund; BlackRock Global Funds - Emerging Europe Fund; BlackRock Global Funds - Emerging Markets Bond Fund; BlackRock Global Funds - Emerging Markets Corporate Bond Fund; BlackRock Global Funds - Emerging Markets Equity Income Fund; BlackRock Global Funds - Emerging Markets Fund; BlackRock Global Funds - Emerging Markets Investment Grade Bond Fund; BlackRock Global Funds - Emerging Markets Local Currency Bond Fund; BlackRock Global Funds - Euro Bond Fund; BlackRock Global Funds - Euro Corporate Bond Fund; BlackRock Global Funds - Euro Short Duration Bond Fund; BlackRock Global Funds - Euro- Markets Fund; BlackRock Global Funds - European Equity Income Fund; BlackRock Global Funds - European Focus Fund; BlackRock Global Funds - European Fund; BlackRock Global Funds - European Special Situations Fund; BlackRock Global Funds - European Value Fund; BlackRock Global Funds - Fixed Income Global Opportunities Fund; BlackRock Global Funds - Flexible Multi-Asset Fund; BlackRock Global Funds - Global Allocation Fund; BlackRock Global Funds - Global Corporate Bond Fund; BlackRock Global Funds - Global Dynamic Equity Fund; BlackRock Global Funds - Global Enhanced Equity Yield Fund; BlackRock Global Funds - Global Equity Fund; BlackRock Global Funds - Global Equity Income Fund; BlackRock Global Funds - Global Government Bond Fund; BlackRock Global Funds - Global High Yield Bond Fund; BlackRock Global Funds - Global Inflation Linked Bond Fund; BlackRock Global Funds - Global Multi-Asset Income Fund; BlackRock Global Funds - Global Opportunities Fund; BlackRock Global Funds - India Fund; BlackRock Global Funds - Japan Flexible Equity Fund; BlackRock Global Funds - Japan Small & MidCap Opportunities Fund; BlackRock Global Funds - Latin American Fund; BlackRock Global Funds - Natural Resources Growth & Income Fund; BlackRock Global Funds - New Energy Fund; BlackRock Global Funds - North American Equity Income Fund; BlackRock Global Funds - Pacific Equity Fund; BlackRock Global Funds - Swiss Small & MidCap Opportunities Fund; BlackRock Global Funds - United Kingdom Fund; BlackRock Global Funds - US Dollar Bond Fund; BlackRock Global Funds - US Dollar High Yield Bond Fund; BlackRock Global Funds - US Dollar Short Duration Bond Fund; BlackRock Global Funds - US Growth Fund; BlackRock Global Funds - US Small & MidCap Opportunities Fund; BlackRock Global Funds - World Agriculture Fund; BlackRock Global Funds - World Bond Fund; BlackRock Global Funds - World Energy Fund; BlackRock Global Funds - World Financials Fund; BlackRock Global Funds - World Gold Fund; BlackRock Global Funds - World Healthscience Fund; BlackRock Global Funds - World Mining Fund; BlackRock Global Funds - World Technology Fund; BlackRock Global Investment Series - Emerging Markets Local Currency Bond Index Portfolio; BlackRock Global Investment Series - Global Equity Income Portfolio; BlackRock Global Investment Series - Income Strategies Portfolio; BlackRock Channel Islands on behalf of Dynamic Diversified Growth Fund, a sub-fund of BlackRock Institutional Jersey Funds; BlackRock Absolute Return Bond Fund; BlackRock

Advantage Global Fund, Inc.; BlackRock Advantage International Fund; BlackRock Advantage Large Cap Growth Fund - Aggregate; BlackRock Advantage U.S. Total Market V.I. Fund of BLK Variable Series Fund; BlackRock All-Cap Energy & Resources Portfolio; BlackRock Appreciation Strategy Fund, Ltd. - Aggregate; BlackRock Asian Dragon Fund, Inc.; BlackRock Balanced Capital Portfolio of BlackRock Series Fund, Inc.; BlackRock Balanced Growth Portfolio Fund; BlackRock Canada CorePlus Long Bond Fund; BlackRock Capital Appreciation Fund, Inc; BlackRock Capital Appreciation Portfolio of BlackRock Series Fund, Inc.; BlackRock Capital Appreciation V.I. Fund of BlackRock Variable Series Fund; BlackRock Capital Investment Corp. - AGG; BlackRock CDN MSCI EAFE Equity Index Class D; BlackRock CDN MSCI EAFE Equity Index Fund; BlackRock CDN MSCI EAFE Index Hedged Fund; BlackRock CDN Russell 3000 Index Hedged Non-Taxable Fund; BlackRock CDN US Equity Index Non-Taxable Class A; BlackRock Commodity Strategies Fund - Aggregate; BlackRock Continental European Fund; BlackRock Continental European Income Fund; BlackRock Core Bond Portfolio; BlackRock Core Bond Trust - Aggregate; BlackRock Asset Management Ireland Limited on behalf of the unitholders in BlackRock Core Plus Global Corporate Bond Fund, a sub- fund of BlackRock Active Selection Fund; BlackRock Corporate Bond Fund; BlackRock Corporate High Yield Fund, Inc.; BlackRock Credit Allocation Income Trust; BlackRock Credit Strategies Income Fund - Aggregate; BlackRock Debt Strategies Fund, Inc.; BlackRock Defined Opportunity Credit Trust; BlackRock Dynamic Diversified Growth Fund; BlackRock Emerging Markets Dividend Fund; BlackRock Emerging Markets Flexible Dynamic Bond Portfolio; BlackRock Emerging Markets Fund; BlackRock Emerging Markets Fund, Inc.; BlackRock Energy & Resources Portfolio; BlackRock Energy and Resources Trust; BlackRock Enhanced Capital and Income Fund, Inc.; BlackRock Enhanced Equity Dividend Trust; BlackRock Enhanced Global Dividend Trust; BlackRock Enhanced Government Fund, Inc.; BlackRock Enhanced International Dividend Trust -Aggregate; BlackRock Equity Dividend Fund; BlackRock Equity Dividend V.I. Fund of BLK Variable Series Fund; BlackRock EuroFund; BlackRock European Absolute Alpha Fund; BlackRock European Dynamic Fund; BlackRock Fixed Income Global Opportunities Fund; BlackRock Floating Rate Income Portfolio; BlackRock Floating Rate Income Strategies Fund, Inc.; BlackRock Floating Rate Income Trust; BlackRock Frontier Markets Fund - Jacket; BlackRock Funds II, High Yield Bond Portfolio; BlackRock Funds II, Inflation Protected Bond Portfolio - Aggregate; BlackRock Asset Management Ireland Limited on behalf of the unitholders in BlackRock Global Aggregate ex-Japan Fund, a sub- fund of BlackRock Active Selection Fund; BlackRock Global Allocation Collective Fund; BlackRock Global Allocation Fund (Aust); BlackRock Global Allocation Fund, Inc; BlackRock Global Allocation Portfolio (Ins - Series); BlackRock Global Allocation Variable Series (V.I.) Fund (Ins - Var Ser); BlackRock Global Dividend Portfolio; BlackRock Global Equity Fund; BlackRock Global Income Fund; BlackRock Global Long/Short Credit Fund - Aggregate; BlackRock Global Long/Short Equity Fund; BlackRock Global Market Insight Fund B - Jacket; BlackRock Global Multi Asset Income Fund; BlackRock Global Opportunities V.I. Fund of BlackRock Variable Series Fund; BlackRock Global Small Cap Fund - NB This fund has been deregistered; BlackRock Gold & General Fund - Natural Resources; BlackRock Growth & Recovery Fund; BlackRock Health Sciences Master Unit Trust; BlackRock Health Sciences Opportunities Portfolio; BlackRock Health Sciences Trust; BlackRock Hedged Global Small Cap Fund - NB This fund has been deregistered; BlackRock High Equity Income Fund; BlackRock High Yield Portfolio of BlackRock Series Fund, Inc; BlackRock High Yield V.I. Fund; BlackRock International Dividend Fund; BlackRock International Equity Fund; BlackRock International Equity Fund; BlackRock International Fund;

BlackRock International Gold Fund; BlackRock International V.I. Fund of BLK Variable Series Fund; BlackRock Korea Emerging Europe Fund - Master; BlackRock Korea Latin American Fund - Master; BlackRock Korea World Energy Fund - Master; BlackRock Korea World Gold Fund - Master; BlackRock Korea World Mining Fund - Master; BlackRock Latin America Fund, Inc.; BlackRock LBG DC 'A' Fund; BlackRock Limited Duration Income Trust - Aggregate; BlackRock Long-Horizon Equity Fund; BlackRock Low Duration Bond Portfolio - Aggregate; BlackRock Managed Income Fund; BlackRock Non-UCITS Retail Funds, on behalf of the unitholders in BlackRock Managed Volatility Fund; BlackRock Non-UCITS Retail Funds, on behalf of the unitholders in BlackRock Managed Volatility Fund I; BlackRock Non-UCITS Retail Funds, on behalf of the unitholders in BlackRock Managed Volatility Fund II; BlackRock Non-UCITS Retail Funds, on behalf of the unitholders in BlackRock Managed Volatility Fund III; BlackRock Managed Volatility V.I. Fund of BlackRock Variable Series Fund; BlackRock Asset Management Ireland Limited on behalf of the unitholders in BlackRock Market Advantage Strategy Fund, a sub-fund of BlackRock Index Selection Fund; BlackRock Mid Cap Dividend Fund of BlackRock Mid Cap Dividend Series, Inc.; BlackRock Mid-Cap Growth Equity Portfolio; BlackRock Monthly Income Fund; BlackRock MSCI ACWI Minimum Volatility Index Fund; BlackRock MSCI Canada Small Cap Equity Index Fund; BlackRock MSCI Canada Small Cap Equity Index Non-Lendable Fund; BlackRock MSCI EAFE Equity Index Non-Lendable Fund; BlackRock MSCI EAFE Equity Index Non-Lendable Fund F; BlackRock MSCI EAFE Equity Index RSL Fund; BlackRock MSCI EAFE Small Cap Equity Index Fund; BlackRock MSCI EAFE Small Cap Equity Index Non-Lendable Fund; BlackRock MSCI Equity Index Fund B - Morocco; BlackRock MSCI Equity Index Non-Lendable Fund - Canada; BlackRock MSCI World ex USA Minimum Volatility Index Fund; BlackRock Multi-Asset Income Portfolio of BlackRock Funds II; BlackRock Multi-Sector Income Trust - Aggregate; BlackRock Natural Resources Growth & Income Fund; BlackRock Natural Resources Trust; BlackRock Overseas Fund; BlackRock Resources and Commodities Strategy Trust - Aggregate; BlackRock Scientific Hedged International Equity Fund; BlackRock Scientific International Equity Fund; BlackRock Strategic Global Bond Fund, Inc. - Aggregate; BlackRock Strategic Income Opportunities Portfolio; BlackRock Tactical Growth Fund; BlackRock Tactical Opportunities Fund; BlackRock Technology Opportunities Fund; BlackRock Total Factor Fund; BlackRock Total Return Portfolio of BlackRock Series Fund, Inc.; BlackRock Total Return V.I. Fund (Ins - Var Ser); BlackRock U.S. Government Bond Portfolio of BlackRock Funds II; BlackRock UK Absolute Alpha Fund; BlackRock UK Dynamic Fund; BlackRock UK Emerging Companies Hedge Fund; BlackRock UK Equity Fund; BlackRock UK Focus Fund; BlackRock UK Fund; BlackRock UK Income Fund; BlackRock UK Smaller Companies Fund; BlackRock UK Special Situations Fund; BlackRock UK Specialist Fund; BlackRock US Dynamic Fund; BlackRock US Opportunities Fund; BlackRock Utilities, Infrastructure & Power Opportunities Trust; BlackRock Yen LIBOR Fund; BLK Global Market Insight Fund; BlackRock Strategic Funds - BlackRock Asia Extension Fund; BlackRock Strategic Funds - BlackRock European Absolute Return Fund; BlackRock Strategic Funds - BlackRock European Opportunities Extension Fund; BlackRock Strategic Funds - BlackRock Fixed Income Strategies Fund; BlackRock Strategic Funds - BlackRock Global Absolute Return Bond Fund; BlackRock Strategic Funds - BlackRock Americas Diversified Equity Absolute Return Fund; BlackRock Strategic Funds - BlackRock Dynamic Diversified Growth Fund; BlackRock Strategic Funds - BlackRock Emerging Markets Absolute Return Fund; BlackRock Strategic Funds - BlackRock Emerging Markets Allocation Fund; BlackRock Strategic Funds - BlackRock European Credit Strategies Fund; BlackRock Strategic Funds - BlackRock

European Diversified Equity Absolute Return Fund; BlackRock Strategic Funds - Emerging Markets Flexi Dynamic Bond Fund; BlackRock Strategic Funds - European Constrained Credit Strategies Fund; Cadbury Hedge Fund Alternatives Portfolio - Aggregate; Canada Alpha Tilts Fund; Canada Alpha Tilts Fund B; Canada Equity Index ESG Screened Fund B; Canada Market Neutral Fund B - Aggregate; CoreAlpha Bond Fund E; CoreAlpha Bond Master Portfolio; CorePlus Bond Fund B; Currency Selection Developed Markets AGG; Currency Selection Emerging Markets AGG; Developed ex-U.S. Real Estate Index Non-Lendable Fund; Developed ex-US Real Estate Index Fund; Developed ex-US Real Estate Index Fund B; Developed Markets Bond Index Mother Fund; Developed Real Estate Index Non- Lendable Fund; EAFE Currency Hedged Equity Index Fund; EAFE Equity Growth Index Fund; EAFE Equity Index Fund E; EAFE Equity Index Fund F; EAFE Equity Index Fund P; EAFE Equity Value Index Fund; EAFE Sudan Free Equity Index Fund; Emerging Markets Alpha Fund B - Jacket; Emerging Markets Alpha Master Fund Ltd.; Emerging Markets Alpha Tilts Fund (Jacket); Emerging Markets Alpha Tilts Fund B (Jacket); Emerging Markets Equity Index ESG Screened Fund B; Emerging Markets Equity Index Master Fund; Emerging Markets Equity Index Plus Fund; Emerging Markets Index Non- Lendable Fund; Emerging Markets Index Non- Lendable Fund B; Emerging Markets Local Bond Index Fund B; Emerging Markets Opportunities LR Fund - Aggregate; Emerging Markets Opportunities MR Fund - Aggregate; Emerging Markets Opportunities MR Fund B - Aggregate; Emerging Markets Small Capitalization Equity Index Fund; Emerging Markets Small Capitalization Equity Index Non- Lendable Fund; Emerging Markets Small Capitalization Equity Index Non- Lendable Fund B; Emerging Markets Strategic Insights Non-Lendable Fund; Emerging Markets Strategic Insights Non-Lendable Fund B; Emerging Markets Sudan Free Equity Index Fund; Equity Dividend (Active Stock Sleeve); Equity Dividend Fund; Europe Alpha Tilts Fund; Europe Alpha Tilts Non-Lendable Fund B; Europe Equity Index ESG Screened Fund B; Europe Ex-UK Alpha Tilts ESG Screened Fund B; Fixed Income GlobalAlpha Master Fund Ltd.; Frontier Markets ESG Screened Fund B - Jacket; Frontier Markets ex-Gulf Cooperation Council Countries ESG Screened Fund B; FTSE RAFI Emerging Index Non- Lendable Fund; Fundamental Large Cap Growth (Active Stock Sleeve); GAL ACM HSBC; GAL ACM RBS; GAL ACM UBS; GAL ECM RBS; GAL HSBC FX; GAL SCM RBS; GAL UBS FX; Global Aggregate ex-USD Bond Index Fund B; Global Aggregate ex-USD Currency Hedged Index Non-Lendable Fund; Global Alpha Tilts Fund B; Global Ascent (Sterling) Ltd.; Global Dividend Income Fund; Global Dividend Income Fund B; Global Equity Focus Fund B; Global Equity Mandate Fund B; Global Ex-US Alpha Tilts Fund; Global High Yield Bond Index Fund B; Global Market Neutral Fund B; Global Multi-cap Equity Fund B; Global Treasury ex-U.S. Screened USD Heded Fund E; Gold Fund; Gold Metal Open Mother Fund; i-mizuho Developed Markets Inflation Linked Bond Index; India Equity Fund Aggregate; International Active Stock Currency Hedged Fund; International Alpha Tilts Fund; International Alpha Tilts Fund B; International Alpha Tilts RSL Fund; International Equity Index Plus Fund Jacket; International Equity Index Plus Fund B - Jacket; International Multi-cap Equity Fund; International Sudan Divestment Index Fund; International Tilts Hedged CAD Fund B; International Tilts Master Portfolio; BlackRock Asset Management Deutschland AG on behalf of iShares EST Health Care (DE); iShares Plc on behalf of iShares \$ Corp Bond UCITS; iShares II Plc on behalf of iShares \$ High Yield Corp Bond UCITS; iShares Plc on behalf of iShares \$ Treasury Bond 1-3yr UCITS; BlackRock Collective Investment Funds, on behalf of the unitholders in iShares 100 UK Equity Index Fund (UK); iShares 1-3 Year International Treasury Bond ETF; BlackRock Collective Investment Funds, on behalf of the unitholders in iShares 350 UK Equity Index Fund (UK); iShares Plc on behalf of iShares AEX

UCITS ETF EUR (Dist); iShares V Plc on behalf of iShares Agribusiness UCITS ETF USD (Acc); iShares Alternatives Completion Portfolio Builder Fund; iShares Asia 50 ETF; iShares Asia Developed Real Estate ETF; iShares Plc on behalf of iShares Asia Pacific Dividend UCITS ETF USD (Dist); iShares II Plc on behalf of iShares Asia Property Yield UCITS ETF USD (Dist); iShares Asia/Pacific Dividend ETF; iShares II Plc on behalf of iShares BRIC 50 UCITS ETF USD (Dist); iShares BRIC Index Fund; iShares Canadian Fundamental Index Fund; iShares Canadian Growth Index ETF; iShares China All-Cap Index Fund; iShares China Index ETF; iShares Plc on behalf of iShares China Large Cap UCITS ETF USD (Dist); iShares China Large-Cap ETF; iShares Conservative Core Portfolio Builder Fund (Trust only); BlackRock Collective Investment Funds, on behalf of the unitholders in iShares Continental European Equity Index Fund (UK); iShares Core Euro Corp Bond UCITS Common Pool; iShares Core Euro Govt Bond UCITS ETF EUR (Dist); iShares Plc on behalf of iShares Core FTSE 100 UCITS; iShares Core GBP Corp Bond UCITS ETF GBP (Dist); iShares Core MSCI AC Asia ex Japan Index ETF; iShares Core MSCI EAFE ETF; iShares Core MSCI EAFE IMI Index ETF; iShares Core MSCI Emerging Markets ETF; iShares Core MSCI Emerging Markets IMI Index ETF; iShares III Plc on behalf of iShares Core MSCI Japan IMI UCITS ETF USD (Acc); iShares Core MSCI Total International Stock ETF; iShares III Plc on behalf of iShares Core MSCI World UCITS; iShares Core S&P 500 Index ETF; iShares Core S&P 500 Index ETF (CAD- Hedged); iShares Core S&P/TSX Capped Composite Index ETF; iShares Core S&P/TSX Composite High Dividend Index ETF; iShares II Plc on behalf of iShares Developed Markets Property Yield UCITS; iShares III Plc on behalf of iShares Developed World ex-UK UCITS ETF; BlackRock Asset Management Deutschland AG on behalf of iShares Dow Jones Asia Pacific Select Dividend 30 UCITS ETF (DE); iShares Dow Jones Canada Select Value Index Fund; BlackRock Asset Management Deutschland AG on behalf of iShares Dow Jones China Offshore 50 UCITS ETF (DE); iShares II Plc on behalf of iShares Dow Jones Global Sustainability Screened UCITS ETF USD (Acc); BlackRock Asset Management Deutschland AG on behalf of iShares Dow Jones Global Titans 50 UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares Dow Jones Industrial Average UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares Dow Jones U.S. Select Dividend UCITS ETF (DE); iShares Edge MSCI EM Minimum Volatility UCITS ETF USD (Acc); iShares Edge MSCI Europe Minimum Volatility UCITS Common Pool; iShares Edge MSCI Min Vol Canada Index ETF; iShares Edge MSCI Min Vol EAFE ETF; iShares Edge MSCI Min Vol EAFE Index ETF; iShares Edge MSCI Min Vol EAFE Index ETF; iShares Edge MSCI Min Vol Emerging Markets ETF; iShares Edge MSCI Min Vol Emerging Markets Index ETF; iShares Edge MSCI Min Vol Global ETF; iShares Edge MSCI Min Vol Global Index ETF; iShares Edge MSCI Min Vol USA Index ETF; iShares VI Plc on behalf of iShares Edge MSCI World Minimum Volatility UCITS; iShares V on behalf of iShares EM Dividend UCITS ETF USD (Dist); iShares EM Infrastructure UCITS ETF USD (Dist); iShares Emerging Asia Local Govt Bond UCITS ETF USD (Dist); iShares Emerging Markets Dividend ETF; BlackRock Global Index Funds - iShares Emerging Markets Equity Index Fund (LU); BlackRock Collective Investment Funds on behalf of the unitholders in iShares Emerging Markets Equity Index Fund (UK); iShares Emerging Markets Fundamental Index ETF; BlackRock Global Index Funds - iShares Emerging Markets Government Bond Index Fund (LU); iShares Emerging Markets Infrastructure ETF; iShares III Plc on behalf of iShares EUR Covered Bond UCITS ETF; iShares II Plc on behalf of iShares EUR Govt Bond 15-30yr UCITS ETF; iShares II Plc on behalf of iShares EUR Govt Bond 7-10yr UCITS ETF; iShares Plc on behalf of iShares EUR Inflation Linked Govt Bond UCITS ETF; iShares III Plc on behalf of iShares Euro Aggregate Bond UCITS

ETF EUR (Dist); iShares III Plc on behalf of iShares Euro Corp Bond 1-5yr UCITS ETF EUR (Dist); iShares III Plc on behalf of iShares Euro Corp Bond ex-Financials 1-5yr UCITS ETF EUR (Dist); iShares III Plc on behalf of iShares Euro Corp Bond ex-Financials UCITS ETF EUR (Dist); iShares Plc on behalf of iShares Euro Corp Bond Large Cap UCITS ETF EUR (Dist); iShares Plc on behalf of iShares Euro Dividend UCITS ETF EUR (Dist); iShares III Plc on behalf of iShares Euro Govt Bond 10-15yr UCITS ETF EUR (Dist); iShares Plc on behalf of iShares Euro Govt Bond 1-3yr UCITS ETF EUR (Dist); iShares II Plc on behalf of iShares Euro Govt Bond 3-5yr UCITS ETF EUR (Dist); iShares III Plc on behalf of iShares Euro Govt Bond 5-7yr UCITS ETF EUR (Dist); iShares Plc on behalf of iShares Euro High Yield Corp Bond UCITS; iShares II Plc on behalf of iShares EURO STOXX 50 UCITS ETF (Acc); iShares III Plc on behalf of iShares EURO STOXX 50 UCITS ETF EUR (Dist); iShares Plc on behalf of iShares EURO STOXX Mid UCITS ETF EUR (Dist); iShares Plc on behalf of iShares EURO STOXX Small UCITS ETF EUR (Dist); BlackRock Asset Management Deutschland AG on behalf of iShares EURO STOXX UCITS ETF (DE); iShares Plc on behalf of iShares Euro Total Market Growth Large UCITS ETF EUR (Dist); iShares Plc on behalf of iShares Euro Total Market Value Large UCITS ETF EUR (Dist); iShares Europe Developed Real Estate ETF; BlackRock Global Index Funds - iShares Europe Equity Index Fund (LU); iShares Europe ETF; iShares Plc on behalf of iShares European Property Yield UCITS ETF EUR (Dist); BlackRock Asset Management Deutschland AG on behalf of iShares FTSE 100 UCITS ETF (DE); iShares Plc on behalf of iShares FTSE 250 UCITS ETF GBP (Dist); iShares FTSE China ETF; iShares II Plc on behalf of iShares FTSE MIB UCITS ETF EUR (Dist); iShares Plc on behalf of iShares FTSEurofirst 100 UCITS ETF EUR (Dist); iShares Plc on behalf of iShares FTSEurofirst 80 UCITS ETF EUR (Dist); iShares Global 100 ETF; iShares Global AAA-AA Govt Bond UCITS ETF USD (Dist); iShares Global Agriculture Index Fund (Trust only); iShares Global Clean Energy ETF; iShares Global Clean Energy UCITS ETF USD (Dist); iShares Global Completion Portfolio Builder Fund (Trust only); iShares Global Consumer Discretionary ETF; iShares Global Consumer Staples ETF; iShares Global Corp Bond EUR Hedged UCITS ETF (Dist); iShares Global Corp Bond UCITS Common Pool; iShares Global Energy ETF; iShares Global Financials ETF; BlackRock Global Index Funds - iShares Global Government Bond Index Fund (LU); iShares Global Govt Bond UCITS Common Pool; iShares Global Healthcare ETF; iShares Global Healthcare Index ETF (CAD-Hedged); iShares VI on behalf of iShares Global High Yield Corp Bond GBP Hedged UCITS ETF (Dist); iShares Plc on behalf of iShares Global High Yield Corp Bond UCITS; iShares Global Industrials ETF; iShares Global Inflation Linked Govt Bond UCITS ETF Common Pool; iShares Global Inflation-Linked Bond ETF; BlackRock Fixed Income Dublin Funds Plc on behalf of iShares Global Inflation-Linked Bond Index Fund (US Dollar Hedged) (IE); iShares Global Infrastructure ETF; iShares Global Infrastructure Index Fund; iShares Global Infrastructure UCITS ETF USD (Dist); iShares Global Materials ETF; iShares Global Monthly Dividend Index ETF (CAD-Hedged) AGG; iShares Global Nuclear Energy ETF; BlackRock Collective Investment Funds on behalf of the unitholders in iShares Global Property Securities Equity Index Fund (UK); iShares Global Real Estate Index ETF; iShares Global Tech ETF; iShares Global Telecom ETF; iShares Global Timber & Forestry ETF; iShares Global Timber & Forestry UCITS ETF USD (Dist); iShares Global Utilities ETF; iShares Global Water Index ETF; iShares Global Water UCITS ETF USD (Dist); iShares Gold Bullion ETF (Trust only); iShares Gold Producers UCITS ETF USD (Acc); iShares Growth Core Portfolio Builder Fund (Trust only); iShares Hong Kong Equity Index Fund; iShares India Index ETF (Trust only); iShares INMEX Total Return TRAC; iShares International Developed Property ETF; iShares International Developed Real Estate ETF; iShares International

Fundamental Index Fund; iShares International High Yield Bond ETF; iShares International Inflation- Linked Bond ETF; iShares International Preferred Stock ETF; iShares International Select Dividend ETF; iShares International Treasury Bond ETF; iShares IPC CompMX Total Return Trac; iShares IPC Large Cap Total Return Trac; iShares J.P. Morgan \$ EM Bond UCITS Common Pool; iShares J.P. Morgan EM Local Currency Bond ETF; iShares III Plc on behalf of iShares J.P. Morgan EM Local Govt Bond UCITS ETF USD (Dist); iShares J.P. Morgan USD EM Bond EUR Hedged UCITS ETF (Dist); iShares J.P. Morgan USD Emerging Markets Bond Index Fund (CAD- Hedged) (Trust only); iShares Jantzi Social Index Fund (Trust only); BlackRock Global Index Funds - iShares Japan Equity Index Fund (LU); BlackRock Collective Investment Funds, on behalf of iShares Japan Equity Index Fund (UK); iShares Japan Fundamental Index Fund (CAD-Hedged) (Trust only); iShares JPX-Nikkei 400 ETF; iShares Latin America 40 ETF; iShares Listed Private Equity UCITS ETF USD (Dist) AGG; iShares II Plc on behalf of iShares MSCI AC Far East ex-Japan Small Cap UCITS ETF USD (Dist); iShares Plc on behalf of iShares MSCI AC Far East ex-Japan UCITS ETF USD (Dist); iShares MSCI ACWI ETF; iShares MSCI ACWI ex U.S. Consumer Discretionary ETF; iShares MSCI ACWI ex U.S. Consumer Staples ETF; iShares MSCI ACWI ex U.S. Energy ETF; iShares MSCI ACWI ex U.S. ETF; iShares MSCI ACWI ex U.S. Financials ETF; iShares MSCI ACWI ex U.S. Healthcare ETF; iShares MSCI ACWI ex U.S. Industrials ETF; iShares MSCI ACWI ex U.S. Information Technology ETF; iShares MSCI ACWI ex U.S. Materials ETF; iShares MSCI ACWI ex U.S. Telecommunication Services ETF; iShares MSCI ACWI ex U.S. Utilities ETF; iShares V Plc on behalf of iShares MSCI ACWI UCITS ETF USD (Acc); iShares MSCI All Country Asia ex Japan ETF; iShares MSCI All Country Asia ex Japan Small-Cap ETF; iShares MSCI All Country Asia Information Technology ETF; iShares MSCI All Peru ETF; iShares MSCI Asia APEX Mid Cap Index ETF; iShares MSCI Asia APEX Small Cap Index ETF; iShares MSCI Australia ETF; iShares MSCI Australia Small-Cap ETF; iShares III Plc on behalf of iShares MSCI Australia UCITS ETF USD (Acc); iShares MSCI Austria ETF; iShares MSCI Belgium ETF; iShares MSCI Brazil ETF; iShares MSCI Brazil Index Fund; iShares MSCI Brazil Small-Cap ETF; iShares Plc on behalf of iShares MSCI Brazil UCITS ETF USD (Dist); iShares MSCI BRIC ETF; iShares MSCI Canada ETF; iShares MSCI Canada Small-Cap ETF; iShares VII Plc on behalf of iShares MSCI Canada UCITS ETF USD (Acc); iShares MSCI China ETF; iShares MSCI China Small-Cap ETF; iShares MSCI Colombia ETF; iShares MSCI Denmark ETF; iShares MSCI EAFE ETF; iShares MSCI EAFE Growth ETF; iShares MSCI EAFE Index Fund (CAD-Hedged) (Trust only); iShares MSCI EAFE International Index Fund; iShares MSCI EAFE Small-Cap ETF; iShares MSCI EAFE Value ETF; iShares Plc on behalf of iShares MSCI Eastern Europe Capped UCITS ETF USD (Dist); iShares VII Plc on behalf of iShares MSCI EM Asia UCITS ETF USD (Acc); iShares MSCI EM Islamic UCITS ETF USD (Dist); iShares MSCI EM Latin America UCITS ETF USD (Dist); iShares MSCI EM Small Cap UCITS ETF USD (Dist); iShares MSCI EM UCITS ETF USD (Acc); iShares MSCI EM UCITS ETF USD (Dist); iShares MSCI Emerging Markets Asia ETF; iShares MSCI Emerging Markets Consumer Discretionary ETF; iShares MSCI Emerging Markets Eastern Europe ETF; iShares MSCI Emerging Markets EMEA ETF; iShares MSCI Emerging Markets Energy Capped ETF; iShares MSCI Emerging Markets ETF; iShares MSCI Emerging Markets Financials ETF; iShares MSCI Emerging Markets Growth ETF; iShares MSCI Emerging Markets Index ETF; iShares MSCI Emerging Markets Latin America ETF; iShares MSCI Emerging Markets Materials ETF; iShares MSCI Emerging Markets Small-Cap ETF; iShares MSCI Emerging Markets Value ETF; iShares III Plc on behalf of iShares MSCI Europe ex-EMU UCITS ETF; iShares Plc on behalf of iShares MSCI Europe ex-UK UCITS ETF EUR (Dist);

iShares MSCI Europe Financials ETF; iShares MSCI Europe Small-Cap ETF; iShares II Plc on behalf of iShares MSCI Europe SRI UCITS ETF EUR (Acc); iShares III Plc on behalf of iShares MSCI Europe UCITS ETF EUR (Acc); iShares II Plc on behalf of iShares MSCI Europe UCITS ETF EUR (Dist); iShares MSCI Eurozone ETF; iShares MSCI Far East Financials ETF; iShares MSCI Finland ETF; iShares MSCI France ETF; iShares MSCI Frontier 100 ETF; iShares MSCI GCC ex-Saudi Arabia UCITS ETF USD (Dist); iShares MSCI Germany ETF; iShares MSCI Germany Small-Cap ETF; iShares MSCI Global Agriculture Producers ETF; iShares MSCI Global Energy Producers ETF; iShares MSCI Global Gold Miners ETF; iShares MSCI Global Metals & Mining Producers ETF; iShares MSCI Global Silver Miners ETF; iShares MSCI Hong Kong ETF; iShares MSCI Hong Kong Small- Cap ETF; iShares MSCI Indonesia ETF; iShares MSCI Ireland ETF; iShares MSCI Israel ETF; iShares MSCI Italy ETF; iShares MSCI Japan CHF Hedged UCITS ETF (Acc) Agg; iShares MSCI Japan ETF; iShares MSCI Japan EUR Hedged UCITS ETF (Acc); iShares MSCI Japan GBP Hedged UCITS ETF (Acc); iShares MSCI Japan Small Cap UCITS ETF USD (Dist); iShares MSCI Japan Small-Cap ETF; iShares Plc on behalf of iShares MSCI Japan UCITS ETF USD (Dist); iShares Plc on behalf of iShares MSCI Japan USD Hedged UCITS ETF (Acc) AGG; iShares MSCI Kokusai ETF; iShares Plc on behalf of iShares MSCI Korea UCITS ETF USD (Dist); iShares MSCI Malaysia ETF; iShares MSCI Mexico ETF; iShares MSCI Mexico IMI Capped UCITS ETF; iShares MSCI Netherlands ETF; iShares MSCI New Zealand ETF; iShares MSCI North America UCITS ETF USD (Dist); iShares MSCI Norway ETF; iShares MSCI Pacific ex Japan ETF; iShares III Plc on behalf of iShares MSCI Pacific ex-Japan UCITS ETF USD (Dist); iShares MSCI Philippines ETF; iShares MSCI Poland ETF; iShares V Plc on behalf of iShares MSCI Poland UCITS ETF USD (Acc); iShares MSCI Singapore ETF; iShares MSCI Singapore Small-Cap ETF; iShares MSCI South Africa ETF; iShares III Plc on behalf of iShares MSCI South Africa UCITS ETF USD (Acc); iShares MSCI Spain ETF; iShares MSCI Sweden ETF; iShares MSCI Switzerland ETF; iShares MSCI Taiwan ETF; iShares MSCI Taiwan UCITS ETF USD (Dist); iShares MSCI Thailand ETF; iShares MSCI Turkey ETF; iShares MSCI Turkey UCITS ETF USD (Dist); iShares MSCI United Kingdom ETF; iShares MSCI United Kingdom Small-Cap ETF; iShares VI Plc on behalf of iShares MSCI World CHF Hedged UCITS ETF (Acc); iShares MSCI World ETF; iShares V Plc on behalf of iShares MSCI World EUR Hedged UCITS ETF (Acc); iShares V Plc on behalf of iShares MSCI World GBP Hedged UCITS ETF (Acc); iShares MSCI World Index Fund; iShares II Plc on behalf of iShares MSCI World Islamic UCITS ETF USD (Dist); iShares Plc on behalf of iShares MSCI World UCITS ETF USD (Dist); iShares NAFTRAC; iShares NASDAQ 100 Index Fund (CAD-Hedged); BlackRock Asset Management Deutschland AG on behalf of iShares NASDAQ-100 UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares Nikkei 225 UCITS ETF (DE); BlackRock Global Index Funds - iShares North America Equity Index Fund (LU); iShares North America Real Estate ETF; BlackRock Collective Investment Funds on behalf of the unitholders in iShares North American Equity Index Fund (UK); iShares NYSE Composite ETF; iShares V Plc on behalf of iShares Oil & Gas Exploration & Production UCITS ETF USD (Acc); iShares Oil Sands Index Fund; BlackRock Collective Investment Funds on behalf of the unitholders in iShares Overseas Corporate Bond Index Fund (UK); BlackRock Collective Investment Funds on behalf of the unitholders in iShares Overseas Government Bond Index Fund (UK); BlackRock Global Index Funds - iShares Pacific ex Japan Equity Index Fund (LU); BlackRock Collective Investment Funds on behalf of the unitholders in iShares Pacific ex Japan Equity Index Fund (UK); iShares VI Plc on behalf of iShares S&P 500 CHF Hedged UCITS ETF (Acc); iShares V Plc on behalf of iShares S&P 500 EUR Hedged UCITS ETF (Acc); iShares V

Plc on behalf of iShares S&P 500 GBP Hedged UCITS ETF (Acc); iShares Plc on behalf of iShares S&P 500 UCITS ETF USD (Dist); iShares S&P Latin America 40 Index Fund; iShares III Plc on behalf of iShares S&P SmallCap 600 UCITS ETF USD (Dist); iShares S&P TSX Canadian Dividend Aristocrats Index Fund; iShares S&P TSX Global Mining Index Fund; iShares S&P US Dividend Growers Index Fund (CAD-Hedged); iShares S&P/TSX 60 Index Fund; iShares S&P/TSX Capped Energy Index Fund; iShares S&P/TSX Capped Information Technology Index Fund; iShares S&P/TSX Capped Materials Index Fund; iShares S&P/TSX Capped REIT Index Fund; iShares S&P/TSX Completion Index ETF; iShares S&P/TSX Global Base Metals Index Fund; iShares S&P/TSX Global Gold Index Fund; iShares S&P/TSX North American Preferred Stock Index Fund (CAD- Hedged); iShares S&P/TSX SmallCap Index Fund; iShares S&P/TSX Venture Index Fund; iShares Short Maturity Bond ETF; iShares Silver Bullion ETF; BlackRock Asset Management Deutschland AG on behalf of iShares SLI UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Asia Pacific 600 Real Estate Cap UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX EU Enlarged 15 UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 50 UCITS ETF (DE); iShares II Plc on behalf of iShares STOXX Europe 50 UCITS ETF EUR (Dist); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Automobiles & Parts UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Banks UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Basic Resources UCITS ETF (DE), a sub- fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Chemicals UCITS ETF (DE), a sub- fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Construction & Materials UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Financial Services UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Food & Beverage UCITS ETF (DE), a sub- fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Health Care UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Industrial Goods & Services UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Insurance UCITS ETF (DE), a sub- fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Media UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Oil & Gas UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Personal & Household Goods UCITS ETF (DE), a sub-fund of iShares (DE)

I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Real Estate UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Retail UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Technology UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Telecommunications UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Travel & Leisure UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe 600 Utilities UCITS ETF (DE), a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe Large 200 UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe Mid 200 UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe Select Dividend 30 UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Europe Small 200 UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares STOXX Global Select Dividend 100 UCITS ETF (DE) a sub-fund of iShares (DE) I Investmentaktiengesellschaft mit Teilgesellschaftsvermögen; BlackRock Asset Management Deutschland AG on behalf of iShares STOXX North America 600 Real Estate Cap UCITS ETF (DE); BlackRock Asset Management Deutschland AG on behalf of iShares TecDAX UCITS ETF (DE); iShares U.S. High Dividend Equity Index ETF (CAD-Hedged); iShares U.S. High Yield Bond Index ETF (CAD-Hedged); iShares U.S. IG Corporate Bond Index Fund (CAD-Hedged); iShares U.S. Small Cap Index ETF (CAD-Hedged); BlackRock Collective Investment Funds on behalf of the unit-holders in iShares UK Equity Index Fund (UK); iShares US & Intl High Yield Corp Bond ETF; iShares II Plc on behalf of iShares US Aggregate Bond UCITS; BlackRock Collective Investment Funds on behalf of the unitholders in iShares US Equity Index Fund (UK); iShares US Fundamental Index ETF; iShares II Plc on behalf of iShares USD Treasury Bond 7-10yr UCITS ETF; BlackRock Global Index Funds - iShares World Equity Index Fund (LU); Japan Alpha Tilts Fd B; Japan Alpha Tilts Fund; Japan Alpha Tilts Fund L; Japan Alpha Tilts Fund O; Japan Equity Index ESG Screened Fund B; Large Cap Active Stock Trading Fund; LifePath 2010 Master Portfolio; LifePath Dynamic 2020 Portfolio - Aggregate; LifePath Dynamic 2030 Portfolio - Aggregate; LifePath Dynamic 2040 Portfolio - Aggregate; LifePath Dynamic Retirement Portfolio - Aggregate; Long Duration Alpha Plus Bond Fund; Long Duration AlphaCredit Plus Bond Fund; Market Advantage Collective Non- Lendable Fund; Market Advantage, Ltd.; Master Total Return Portfolio of Master Bond LLC - Aggregate; Master Total Return Portfolio of Master Bond LLC - Aggregate; MSCI Canada Small Cap Equity Index Fund B; MSCI EAFE Equity Index Non- Lendable Fund B; MSCI EAFE Small Cap Equity Index Fund B; MSCI EMU IMI Index Fund B; MSCI Eq Index Fd B-Argentina; MSCI Eq Index Fd B-India; MSCI Eq Index Fd B-S Korea; MSCI Eq Index Fd B-Taiwan; MSCI Eq Index Fd-Malaysia; MSCI Equity Index Fund - Australia; MSCI Equity Index Fund - Austria; MSCI Equity Index Fund - Belgium; MSCI Equity Index Fund - Canada; MSCI Equity Index Fund - Denmark; MSCI Equity Index Fund - Finland;

MSCI Equity Index Fund - France; MSCI Equity Index Fund - Germany; MSCI Equity Index Fund - Greece; MSCI Equity Index Fund - Hong Kong; MSCI Equity Index Fund - Ireland; MSCI Equity Index Fund - Italy; MSCI Equity Index Fund - Japan; MSCI Equity Index Fund - Mexico; MSCI Equity Index Fund - Netherlands; MSCI Equity Index Fund - New Zealand; MSCI Equity Index Fund - Norway; MSCI Equity Index Fund - Portugal; MSCI Equity Index Fund - Singapore; MSCI Equity Index Fund - Spain; MSCI Equity Index Fund - Sweden; MSCI Equity Index Fund - Switzerland; MSCI Equity Index Fund - Turkey; MSCI Equity Index Fund - United Kingdom; MSCI Equity Index Fund B - Austria; MSCI Equity Index Fund B - Belgium; MSCI Equity Index Fund B - Brazil; MSCI Equity Index Fund B - Canada; MSCI Equity Index Fund B - Chile; MSCI Equity Index Fund B - China; MSCI Equity Index Fund B - Colombia; MSCI Equity Index Fund B - Czech Republic; MSCI Equity Index Fund B - Denmark; MSCI Equity Index Fund B - Egypt; MSCI Equity Index Fund B - Finland; MSCI Equity Index Fund B - France; MSCI Equity Index Fund B - Germany; MSCI Equity Index Fund B - Greece; MSCI Equity Index Fund B - Hong Kong; MSCI Equity Index Fund B - Hungary; MSCI Equity Index Fund B - Indonesia; MSCI Equity Index Fund B - Ireland; MSCI Equity Index Fund B - Israel; MSCI Equity Index Fund B - Italy; MSCI Equity Index Fund B - Japan; MSCI Equity Index Fund B - Malaysia; MSCI Equity Index Fund B - Mexico; MSCI Equity Index Fund B - Netherlands; MSCI Equity Index Fund B - New Zealand; MSCI Equity Index Fund B - Norway; MSCI Equity Index Fund B - Peru; MSCI Equity Index Fund B - Philippines; MSCI Equity Index Fund B - Poland; MSCI Equity Index Fund B - Portugal; MSCI Equity Index Fund B - Russia; MSCI Equity Index Fund B - Singapore; MSCI Equity Index Fund B - South Africa; MSCI Equity Index Fund B - Spain; MSCI Equity Index Fund B - Sweden; MSCI Equity Index Fund B - Switzerland; MSCI Equity Index Fund B - Thailand; MSCI Equity Index Fund B - Turkey; MSCI Equity Index Fund B - United Kingdom; MSCI Equity Index Fund B - Australia; MSCI Equity Index Non-Lendable Fund B - Canada; MSCI Europe Equity Index Fund B; Multi Currency Alpha Tilts Social Screen B; The Obsidian Fund - Aggregate; Pacific ex-Japan Equity Index ESG Screened Fund B; Pan Asia Opportunities Fund B - Jacket; Q-BLK ARS III - Institutional, Ltd.; R3 Capital; Russell Developed ex-U.S. Large Cap Index Fund; Russell Developed ex-U.S. Large Cap Index Fund B; Strategic Income Opportunities Bond Fund; Swiss Performance Index Non- Lendable Fund B; The 32 Capital Yen Fund Ltd.; Total International ex U.S. Index Master Portfolio; U.S. Long Corporate Bond Fund; US Basic Value Open Mother Fund (9810); US Core Bond Mother Fund (9834); US Small Cap Growth Stock Mother Fund (9802); World Alpha Tilts Fund B; World Alpha Tilts Non-Lendable Fund B; World Bond Mother Fund (JPY Hedged) (9816); World Bond Mother Fund (Unhedged) (9815); World ex-U.S. Index Fund A2; World Ex-US Alpha Tilts Fund; World ex-US Alpha Tilts Fund B; World ex-US Alpha Tilts Fund L; World ex-US Alpha Tilts Fund O; World ex-US Small Cap Plus Fund - Jacket

b. Plaintiffs' representatives

Daniel L. Brockett
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor,
New York, New York 10010
United States of America

Anthony P. Alden
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
United States of America

c. Defendants

Bank of America Corporation; Bank of America, N.A.; Merrill Lynch, Pierce, Fenner & Smith Inc.; Barclays Bank PLC; Barclays PLC; Barclays Capital, Inc.; BNP Paribas Group; BNP Paribas USA, Inc.; BNP Paribas S.A.; BNP Paribas Securities Corp.; Citigroup, Inc.; Citibank, N.A.; Citigroup Global Markets, Inc.; Credit Suisse AG, Credit Suisse Group AG; Credit Suisse Securities (USA) LLC; Deutsche Bank AG; Deutsche Bank Securities Inc.; HSBC Bank PLC; HSBC North America Holdings Inc.; HSBC Bank USA, N.A.; HSBC Securities (USA) Inc.; JPMorgan Chase & Co.; JP Morgan Chase Bank, N.A.; J.P. Morgan Securities LLC; Morgan Stanley; Morgan Stanley & Co., LLC; Morgan Stanley & Co. International PLC; The Royal Bank of Canada; Royal Bank of Scotland PLC; NatWest Markets Securities Inc.; SG Americas Securities LLC; Société Générale S.A.; Standard Chartered Bank; UBS AG; UBS Securities LLC; The Goldman Sachs Group, Inc.; Goldman, Sachs & Co. LLC

d. Defendants' representatives

Adam S. Hakki
Richard F. Schwed
Jeffrey J. Resetarits
Shearman & Sterling LLP
599 Lexington Avenue
New York, New York 10022

Counsel for Bank of America Corporation; Bank of America, N.A.; Merrill Lynch, Pierce, Fenner & Smith Inc.

David C. Esseks
Laura R. Hall
Rebecca Ann Cecchini
Allen & Overy LLP
1221 Avenue of the Americas
New York, New York 10020

Joshua A. Goldberg
Alejandro H. Cruz
Dakotah Burns
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, New York 10036

Counsel for BNP Paribas (identified in the Third Amended Complaint as “BNP Paribas Group” and “BNP Paribas S.A.”); BNP Paribas USA, Inc.; BNP Paribas Securities Corp¹

Matthew A. Schwartz
Christopher J. Dunne
Mark A. Popovsky
Sullivan & Cromwell LLP
125 Broad Street
New York, New York 10004

Counsel for Barclays Bank PLC; Barclays PLC; Barclays Capital, Inc.

Andrew A. Ruffino
Covington & Burling LLP
620 Eighth Avenue
New York, New York 10018

Andrew D. Lazerow
Covington & Burling LLP
850 Tenth Street, N.W.
Washington, D.C. 20001

Counsel for Citigroup Inc.; Citibank, N.A.; Citigroup Global Markets Inc.

David G. Januszewski
Herbert S. Washer
Elai Katz
Jason M. Hall
Edward Moss
Cahill Gordon & Reindell LLP
32 Old Slip
New York, New York 10005

Counsel for Credit Suisse AG, Credit Suisse Group AG; Credit Suisse Securities (USA) LLC

Joseph Serino, Jr.
Latham & Watkins LLP
885 Third Avenue
New York, New York 10022

G. Patrick Montgomery
King & Spalding LLP

¹ Allen & Overy LLP does not represent Defendants BNP Paribas, BNP Paribas USA, Inc., and BNP Paribas Securities Corp. with respect to claims by Claimants affiliated with BlackRock, Inc.

1700 Pennsylvania Ave., NW
Washington, DC 20006

Counsel for Deutsche Bank AG; Deutsche Bank Securities Inc.

Rishi Zutshi
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, New York 10006

Counsel for The Goldman Sachs Group, Inc.; Goldman, Sachs & Co. LLC

Gregory T. Casamento
Locke Lord LLP
3 World Financial Center
New York, New York 10281

Roger B. Cowie
Locke Lord LLP
2200 Ross Avenue, Suite 2800
Dallas, TX 75201

J. Matthew Goodin
Julia C. Webb
Locke Lord LLP
111 South Wacker Drive
Chicago, IL 60606

Counsel for HSBC Bank PLC; HSBC North America Holdings Inc.; HSBC Bank USA, N.A.; HSBC Securities (USA) Inc.

Boris Bershteyn
Skadden Arps, Slate, Meagher & Flom LLP
One Manhattan West
New York, New York 10001

Gretchen Wolf
Skadden Arps, Slate, Meagher & Flom LLP
155 N. Wacker Dr., Suite 2700
Chicago, Illinois 60606

Paul M. Kerlin
Skadden Arps, Slate, Meagher & Flom LLP
1440 New York Avenue N.W.
Washington, DC 20005

Tibor L. Nagy, Jr.
Jason Kolbe
Dontzin Nagy & Fleissig LLP
980 Madison Avenue
New York, New York 10075

Counsel for JPMorgan Chase & Co.; JP Morgan Chase Bank, N.A.; J.P. Morgan Securities LLC²

Jonathan Moses
Andrew J.H. Cheung
Daniel J. Brenner
Justin L. Brooke
Wachtell, Lipton, Rosen & Katz
51 West 52nd Street
New York, New York 10019

Counsel for Morgan Stanley; Morgan Stanley & Co., LLC; Morgan Stanley & Co. International PLC

Paul S. Mishkin
Adam G. Mehes
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, New York 10017

Counsel for The Royal Bank of Scotland plc (n/k/a NatWest Markets Plc); NatWest Markets Securities Inc.

James P. McLoughlin, Jr.
Mark A. Nebrig
Joshua D. Lanning
Moore and Van Allen PLLC
100 N. Tyron Street, Suite 4700
Charlotte, North Carolina 28202

Counsel for RBC Capital Markets LLC; The Royal Bank of Canada

James R. Warnot, Jr.
Adam S. Lurie
Patrick C. Ashby
Nicole E. Jerry

² Skadden Arps, Slate, Meagher & Flom LLP does not represent JPMorgan Chase & Co., JP Morgan Chase Bank, N.A. and J.P. Morgan Securities LLC with respect to claims by BlackRock, Inc. or BlackRock-related entities listed in Appendix C of the *Allianz* complaint.

Linklaters LLP
1290 Avenue of the Americas
New York, New York 10104

Steven Wolowitz
Henninger S. Bullock
Andrew J. Calica
Victoria D. Whitney
Mayer Brown LLP
1221 Avenue of the Americas
New York, New York 10020

*Counsel for Société Générale*³

Lewis S. Wiener
Ronald W. Zdrojeski
Meghana D. Shah
Eversheds Sutherland LLP
1114 Avenue of the Americas
New York, New York 10036

Benjamin A. Fleming
Hogan Lovells US LLP
390 Madison Ave.
New York, New York 10017

Lisa J. Fried
Marc J. Gotridge
Herbert Smith Freehills New York LLP
450 Lexington Avenue
14th Floor
New York, New York 10017

Counsel for Standard Chartered Bank

Eric J. Stock
Philip O. Shapiro
Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, New York 10166

Melanie L. Katsur
Amy Feagles

³ Linklaters LLP does not represent Société Générale with respect to claims by BlackRock, Inc. or BlackRock-related entities listed in Appendix C of the *Allianz* complaint.

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036

Counsel for UBS AG; UBS Securities LLC

7a. Nature and purpose of the proceedings

The Plaintiffs in this case (including Portigon) allege that the Defendants engaged in a conspiracy to fix prices in the foreign exchange (“FX”) market in violation of the Sherman Act, 15 U.S.C. § 1, and for unjust enrichment.

7b. Summary of complaint

A copy of Plaintiffs’ Third Amended Complaint (“Complaint”), dated July 28, 2020, is attached as Exhibit 2 hereto. The nature of the action is summarized at Complaint, ¶¶ 1–13. Plaintiffs allege, *inter alia*, that Defendants entered into a conspiracy to manipulate prices in the FX business from January 1, 2003 through December 31, 2013, in violation of U.S. antitrust laws. Specifically, Plaintiffs allege that Defendants’ conspiracy encompassed, over an eleven-year period: (a) coordinating bid/ask spreads quoted to customers; and (b) manipulating FX benchmark rates, such as the WM/Reuters and ECB benchmark rates. *See, e.g.*, Complaint ¶¶ 1–13, 465–663. Plaintiffs seek damages and other relief for alleged injuries caused by Defendants’ alleged wrongdoing.

7c. Summary of defenses

A copy of the Answer and Affirmative Defenses of Defendants Citigroup Inc., Citibank, N.A., and Citigroup Global Markets Inc. to Plaintiffs’ Third Amended Complaint, dated September 4, 2020, is attached as Exhibit 3 hereto. Defendants deny they entered into the eleven-year overarching conspiracy to fix and/or otherwise manipulate prices in the FX business that is alleged in the Complaint. Defendants moved to dismiss Plaintiffs’ claims on various legal grounds, including failing to state a claim for relief. The Court granted, in part, and denied, in part, Defendants’ motions to dismiss. Defendants contend that Plaintiffs cannot prove their claims and were not harmed by Defendants’ alleged conduct, and that the statute of limitations has run on Plaintiffs’ claims in whole or in part.

8a. Evidence to be obtained

This Court respectfully requests that the appropriate judicial authority in the Kingdom of the Netherlands cause the appropriate orders to be issued to direct the testimony, under oath, of Mr. Portlock to be used at trial in this Proceeding.

8b. Purpose of the evidence or judicial act sought

Because Mr. Portlock resides outside the subpoena power of this Court, and therefore cannot be compelled to testify at trial, Defendants seek deposition testimony to defend against Plaintiffs’ claims at trial. Defendants have represented to this Court that Mr. Portlock has personal

knowledge of matters material and relevant to the matters at issue in the Proceeding for the period of at least 2006 through 2010. As set forth below, Defendants contend that the evidence sought relates to the matters in question in the Proceeding, including:

- a. Mr. Portlock's background and employment are allegedly relevant to establishing the foundation for him to testify about several aspects of Defendants' defenses.
- b. Mr. Portlock's testimony regarding his knowledge of the FX business, including but not limited to, his knowledge of bid/ask spreads, benchmark rates, the relationship between bid/ask spreads and prices, and the different FX order and transaction types and their relationship to each other.
- c. Mr. Portlock's testimony regarding WestLB's alleged evaluation and assessment of which Defendants and other banks to trade FX with, including their purported ability to drive competition among Defendants and other banks by obtaining multiple quotes and using spread matrices, is allegedly relevant to Defendants' defenses.
- d. Mr. Portlock's testimony regarding his knowledge of WestLB's FX trading location(s) is allegedly relevant to Defendants' defenses.
- e. Mr. Portlock's testimony regarding WestLB's FX trading policies, including any best execution policies, is allegedly relevant to Defendants' defenses.
- f. Mr. Portlock's testimony regarding WestLB's alleged use of various FX order and transaction types, including, among others, benchmark orders, resting orders, market orders, swaps, forwards, and futures, is purportedly relevant to Defendants' defenses.
- g. Mr. Portlock's testimony regarding WestLB's alleged tracking, evaluation, and/or comparison of banks' FX pricing, including through studies, analyses, surveys, counterparty reviews, and other means, is purportedly relevant to Defendants' defenses.
- h. Mr. Portlock's testimony regarding WestLB's trading strategies is allegedly relevant to Defendants' defenses.
- i. Mr. Portlock's testimony regarding WestLB's alleged use of any third parties that executed or intermediated FX transactions is purportedly relevant to Defendants' defenses.
- j. Mr. Portlock's testimony regarding WestLB's alleged receipt of FX market information from Defendants or other FX market participants is purportedly relevant to Defendants' defenses.
- k. Mr. Portlock's testimony regarding WestLB's alleged participation in—and knowledge or awareness of Defendants' participation in—interbank chatrooms, including what information may have been exchanged in such chatrooms, is purportedly relevant to Defendants' defenses.

1. Mr. Portlock's testimony regarding WestLB's alleged knowledge of media reports and governmental (and/or regulatory) investigations into alleged misconduct in the FX market is purportedly relevant to Defendants' defenses.
- m. Mr. Portlock's testimony regarding his knowledge of WestLB's actual or estimated profit and loss from FX trading is allegedly relevant to Defendants' defenses.

9. Identity and address of any person to be examined

Mark Portlock
[REDACTED]

10. Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined

- a. Mr. Portlock's educational background, employment history, professional qualifications, cooperation or separation agreements, relationships with other portfolio managers or traders and personal preparation for the deposition (to include any contacts the witness may have had with the parties, their lawyers, and other witnesses, but excluding any privileged content of such communications).
- b. Mr. Portlock's knowledge of the FX market, including, but not limited to, his knowledge of bid/ask spreads, benchmark rates, the relationship between bid/ask spreads and prices, and the different FX order and transactions types and their relationship to each other.
- c. Mr. Portlock's knowledge of any WestLB evaluation and assessment regarding which banks to trade FX with, including any purported ability to drive competition among Defendants and other banks by allegedly obtaining multiple quotes and using spread matrices.
- d. Mr. Portlock's knowledge and understanding of the trading location(s) of WestLB and its FX counterparties.
- e. Mr. Portlock's understanding and awareness of, and compliance with, any WestLB's policies regarding FX trading.
- f. Mr. Portlock's purported use of various FX order and transaction types, including, among others, benchmark orders, resting orders, market orders, limit orders, swaps, forwards, futures, on behalf of WestLB.
- g. Mr. Portlock's knowledge and understanding of the FX trading strategies employed by WestLB.
- h. Mr. Portlock's purported tracking, evaluation, and/or comparison of banks' FX pricing, including through studies, analyses, surveys, counterparty reviews, and other means, while at WestLB.

- i. Mr. Portlock's alleged use of any third parties that executed or intermediated FX transactions of WestLB.
- j. Mr. Portlock's alleged receipt and sharing of FX market information with Defendants and other FX market participants.
- k. Mr. Portlock's alleged knowledge or awareness of Defendants' participation in interbank chatrooms related to FX trading, including what information may have been exchanged in such chatrooms.
- l. Mr. Portlock's alleged knowledge of media reports and governmental (and/or regulatory) investigations into alleged misconduct in the FX market.
- m. Mr. Portlock's knowledge of WestLB's actual or estimated profit and loss from FX trading.
- n. Mr. Portlock's knowledge regarding documents shown to him during the examination, including: (i) purported internal WestLB communications regarding FX trading; and (ii) alleged communications with Defendants and others regarding FX trading.

11. Documents or other property to be inspected

There is no request for Mr. Portlock to produce any documents.

12. Any requirement that the evidence be given on oath or affirmation and any special form to be used

The examination of the individuals identified at Section 9 above will be taken under oath before: (1) a secretary of embassy, counsel general, consul, vice-consul, or consular agent of the United States of America; (2) any officer authorized to administer oaths under the laws of the United States of America or of the Kingdom of the Netherlands; or (3) before a person appointed by you and empowered to administer oaths and take testimony.

This Court further requests that you, by your proper process, require that the testimony given during the above-described testimony be given under the following oath or affirmation: "I [deponent] swear that the testimony that I am about to give is the truth, the whole truth and nothing but the truth."

13. Special methods or procedure to be followed

This Court respectfully requests that:

- a. The examination of the individuals identified in Section 9 above be taken under the Federal Rules of Civil Procedure of the United States of America, except to the extent that any such procedure is incompatible with the law of the Kingdom of the Netherlands.

- b. The examination of Mr. Portlock be conducted by (i) attorneys for the Defendants or other duly authorized representatives, qualified to practice law in United States jurisdictions and/or in the Kingdom of the Netherlands, nominated by the Defendants; (ii) the witness's counsel; and (iii) attorneys for Plaintiffs. Defendants' United States counsel are familiar with the case, and the examination of the witness by Defendants' United States counsel is therefore required to safeguard due process of law, in particular the process of establishing the truth, as they are best-placed to examine the witness.
- c. The examinations and cross-examinations be recorded verbatim stenographically and by videotape, with a professional videographer and a professional stenographer—provided at the charge of Defendants—being permitted to attend the oral testimony in order to record the testimony.

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified

It is requested that testimony be taken at such place, date or time as ordered by The District Court in The Hague (Rechtbank Den Haag) and/or as otherwise agreed to by the witnesses and the respective representatives of the Parties.

Notice thereof should be made to Defendants' designee:

Andrew A. Ruffino
Covington & Burling LLP
620 Eighth Avenue
New York, New York 10018
Telephone: (212) 841-1000
aruffino@cov.com

Andrew D. Lazerow
Covington & Burling LLP
850 Tenth Street, NW
Washington, DC 20001
Telephone: (202) 662-6000
Email: alazerow@cov.com

Counsel for Defendants will promptly send notice to counsel for all parties to the action.

15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request

None.

16. Specification of privilege or duty to refuse to produce documents under law of the State of origin

Neither this request for international judicial assistance, the transmission of documents pursuant to the Hague Convention, nor any examination, including without limitation, this request and all transcripts of Mr. Portlock's examinations shall waive, or be deemed or argued to have waived, the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of the Kingdom of the Netherlands, the United States of America, or the State of New York, including the privilege against self-incrimination.

The examination of Mr. Portlock shall not be oppressive. Moreover, Mr. Portlock's testimony will proceed under the terms of the Protective Order and, therefore, will be given confidential treatment in connection with this Proceeding.

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by

Defendants.

Date of Request: June 16, 2022



Signature and Seal of the Requesting Authority